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July 18, 2023

Hon. Pamela K. Chen
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: West Coast Servicing v. Alam, Docket No. 22-cv-02881
Letter Request for Extension of Briefing Schedule

Dear Judge Chen:

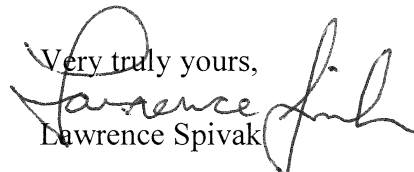
I am counsel for Defendant. I write to apologize for my failure to respond to the letter request of Plaintiff's counsel for a pre-motion conference. This is my only case in federal court and I was not aware of your Honor's individual rules that require a response to a letter request within seven days. After receiving a reminder from this Court, I neglected to file a letter due to a heavy motion and appearances schedule that week. By the time the second week had passed, I had missed the opportunity and the Court had already issued a briefing schedule for the motion by Order dated June 9, 2023.

This entire year has been difficult for my staff and me such that I have been compelled to take over most administrative tasks, including answering most phone calls, filing, etc. in addition to doing written legal work. I am a sole practitioner and my only staff are part-time. They have minimal litigation support experience and are not able to help me with any correspondence to the Court.

Nevertheless, I believe this action should be settled by the parties without motion practice. I have initiated settlement discussions with Plaintiff's counsel and ask that the Court extend the Plaintiff's motion submission date by two weeks, from July 21, 2023 through August 4, 2023. In addition, I would request that the Court extend Defendant's deadline for opposition by two weeks and extend Defendant's reply time by two weeks.

I have consulted with Plaintiff's counsel regarding this application. Counsel neither agrees with nor opposes this request. Thanks for your consideration of this matter.

Cc: Shachar Hadar, Esq.
Danielle Light, Esq.

Very truly yours,

Lawrence Spivak